

EXHIBIT O

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

KELVIN D. DANIEL, et al

Plaintiffs,

v.

SWIFT TRANSPORTATION
CORPORATION,

Defendant.

Case No. 2:11-cv-01548-PHX-ROS

**PLAINTIFF KELVIN DANIEL'S
ANSWERS TO DEFENDANT SWIFT
TRANSPORTATION CO. OF
ARIZONA, LLC'S SECOND SET OF
INTERROGATORIES**

Assigned to: Hon. Roslyn O. Silver

GENERAL OBJECTIONS

1
2 1. Plaintiff, Kelvin Daniel ("Daniel") objects to Swift's "General Instructions"
3
4 and "Definitions" to the extent they purport to impose discovery obligations that differ
5 from or exceed the discovery obligations imposed by the Federal Rules of Civil
6 Procedure.

7 2. Daniel objects to the Interrogatories to the extent that they seek information
8 protected by the attorney-client privilege, the work-product privilege, or any other
9 privilege, protection, or immunity applicable under Arizona and/or federal law.
10

11 3. Daniel objects to the Interrogatories to the extent that they are overly broad,
12 unduly burdensome, oppressive, and/or seek information that is not relevant to the issues
13 in this lawsuit or reasonably calculated to lead to the discovery of admissible evidence.
14

15 4. These General Objections are made, to the extent applicable, in response to
16 each of the Interrogatories as if the objections were fully set forth therein.

17 5. Daniel responds to each of the Interrogatories based upon information and
18 documentation available as of the date hereof and reserve the right to supplement and
19 amend his responses.
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INTERROGATORIES

Interrogatory No. 1: Explain whether you were a class member in the litigation against HireRight Solutions, Inc. in the United States District Court for the Eastern District of Virginia, Case No. 3:09-cv-625, and, if you were, when you received notice of the suit, what class you were in, and what remedy, if any, you received as a class member in the settlement of that lawsuit.

Response:

Objection. Daniel objects to this Interrogatory as it seeks information irrelevant to the subject matter in this case and the information sought is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection and without waiving same, Daniel was not a class member in the litigation mentioned in Interrogatory No. 1.

Interrogatory No. 2: Explain whether you currently or have ever previously been a member of any other class action cases other than your current litigation against Swift and, if so, please identify the litigation and any remedy, if any, you received as a class member in that lawsuit.

Response:

Objection. Daniel objects to this Interrogatory as it seeks information irrelevant to the subject matter in this case and the information sought is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection and without waiving same, Daniel has not been a member of any other class action.

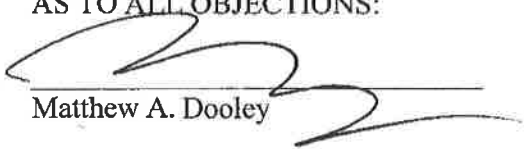
Interrogatory No. 3: Explain how you first came into contact with your attorneys regarding this suit, including the date, who made initial contact, the means of contact (through a web site, mailing, telephone call, etc.), whether you were solicited to become a class representative, whether you have been promised anything in exchange for being a class representative (such as an incentive award) and any amount promised.

Response:

Objection. Daniel objects to this Interrogatory as it seeks information irrelevant to the subject matter in this case and the information sought is not reasonably calculated to lead to

1 the discovery of admissible evidence. Further objecting, this interrogatory seeks
2 information that is protected by the attorney-client privilege and/or work product doctrine.
3

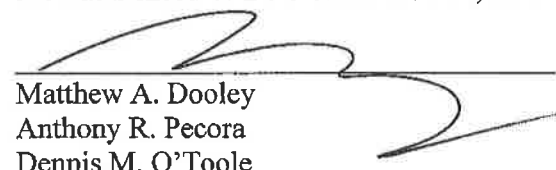
4 AS TO ALL OBJECTIONS:

5 
6 Matthew A. Dooley

7 Respectfully Submitted,

8 STUMPHAUZER, O'TOOLE, MCLAUGHLIN,
9 McGLAMERY & LOUGHMAN CO., LPA

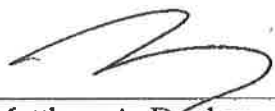
10 By:

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CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2012, the original and one copy of the foregoing was served via U.S. Mail, Postage Pre-Paid to the following counsel of record:

John F. Lomax, Jr., Esq.
Brian J. Foster, Esq.
Joseph A. Kroeger, Esq.
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Counsel for Defendant



Matthew A. Dooley
Counsel for Plaintiffs

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VERIFICATION

STATE OF Georgia)
COUNTY OF Fulton) SS:

Tanna Hodges, being duly sworn according to law, deposes and states that the answers to the foregoing 2nd Set of Interrogatories are true to the best of his knowledge and belief.


Kelvin Daniel

SWORN TO BEFORE ME, a Notary Public, and subscribed in my presence this
14 day of September, 2012.


Notary Public
